

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

THE UNITED STATES OF AMERICA *ex rel.*  
JULIE LONG,

*Plaintiffs,*

v.

JANSSEN BIOTECH, INC.,

*Defendant.*

Civil Action No. 16-CV-12182-FDS

**[PROPOSED] ORDER GRANTING DEFENDANT’S MOTION FOR PROTECTIVE  
ORDER CONCERNING RELATOR’S 30(b)(6) DEPOSITION NOTICE**

Pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, and for the reasons set forth in Defendant Janssen Biotech, Inc. (“Janssen’s”) Motion and supporting Memorandum of Law, the Court hereby **GRANTS** Defendant’s Motion.

**IT IS THEREFORE ORDERED** that a protective order related to Relator Julie Long’s (“Relator’s”) Notice of Deposition of the Corporate Representative of Janssen under Federal Rule of Civil Procedure 30(b)(6) is issued, requiring that:

- (1) Relator may not seek information protected by the attorney-client privilege or work product protection; and
- (2) Janssen may provide a witness to testify about the programs at issue collectively, rather than on an individual basis, and to testify about corporate records, policies, and practices on a general basis, rather than as to every single record, policy, or practice that falls within the topics identified.

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Hon. M. Page Kelley  
Chief Magistrate Judge